

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION**

BETTY ANN BURKS, et al.,

Plaintiffs,

v.

**EQUITY GROUP EUFAULA
DIVISION, LLC,**

Defendant.

§
§
§
§
§
§
§
§
§
§

**CIVIL ACTION NO.
2:06-cv-01081-MEF-DRB**

NOTICE OF FILING ADDITIONAL CONSENTS TO JOIN

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, SHANNON BURKS, DASHANNA COLLINS, MANTRA E. DAVIE, JANNETTA DARBY, KENNY LEE HENRY, SHALEATHA KING and DESMOND MURRY, similarly situated employees to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above captioned lawsuit.

Dated: March 6, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp
ROBERT JOSEPH CAMP

505 North 20th Street, Suite 825
Birmingham, Alabama 35203
(205) 930-6900-Telephone
(205) 930-6910- Facsimile

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2007, I electronically filed the above Notice with the Clerk of the District Court using CM/ECF System, which sent notification of such filing to:

Samuel A. Cherry
Attorney for Plaintiffs
scherry@cochranfirm.com

Lance Harrison Swanner
Attorney for Plaintiffs
lswanner@cochranfirm.com

Bernard D. Nomberg
Attorney for Plaintiffs
bnomberg@cochranfirm.com

Courtney Reily Pothoff
Attorney for Defendant
cpothoff@mindspring.com

Joel P. Smith, Jr.
Attorney for Defendant
joelpsmith@bellsouth.net

Gary D. Fry
Howard A. Rosenthal
Malcolm S. Gould
Pelino & Lentz, P.C.
One Liberty Place, 32nd Floor
1650 Market Street
Philadelphia, PA 1910-7393
Phone: 215-246-3165
Fax: 215-665-1536
Attorney for Defendant

/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Shannon Burks states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Leystone Equity Group, LLC at the facility located in Bakerhill, AL. I worked at this location from 10-24 to April 05.
[Name of Plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Leystone Equity Group, LLC plant in Bakerhill, AL, and possibly other plants owned by Leystone Equity Group, LLC. I brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant] [City/State] [Name of Plant] [LLC]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 24 day of Feb., 2007.

Shannon Burks
[PRINT NAME]

Shannon Burks
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Dashanna Collins states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.

2. I am currently, or was formerly employed, by ~~Idexstone~~ Equity Food Group at
[Name of Plant]
the facility located in Bakerhill / AL. I worked at this location from
[City/State]
3-23-05 to 3-22-06.
[Date] [Date, or if still working write "present"]

3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.

4. I believe I have not been paid for all compensable time, which I have worked, including overtime.

5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.

6. I understand that this suit may be brought as a class action covering employees at the Equity Food Group plant in Bakerhill / AL, and
[Name of Plant] [City/State]
possibly other plants owned by Equity Food Group, LLC. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 19 day of February, 2007.

Dashanna Collins
[PRINT NAME]

Dashanna Collins
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Montra E. Dawie

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC ~~Keystone Foods~~ at
[Name of plant]
the facility located in Baker Hill Ala. [City/State]. I worked at this location from
Sept 18, 2006 to present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that Equity Group, LLC this suit may be brought as a class action covering employees at the Keystone Foods plant in Baker Hill, Ala. and
[Name of Plant] [City/State]
possibly other plants owned by Keystone Foods. If brought as a class
[Name of Plant] Equity Group, LLC
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 4 day of November, 2006.

Montra Dawie
[PRINT NAME]

Montra Dawie
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Jannetta Darby states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC at the facility located in Bakerhill, VA. I worked at this location from 08/06/98 to present.
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Equity Group, LLC plant in Bakerhill, VA, and possibly other plants owned by Equity Group, LLC. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16 day of Sept, 2006.

JANNETTA DARBY
[PRINT NAME]

Jannetta Darby
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

KENNY LEE HENRY states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC at
CHARCOEN POKPHAND [Name of Plant]
the facility located in BAKERHILL, AL [City/State]. I worked at this location from
9/1/2003 to 5/15/2004.
02-15-07 [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Equity Group, LLC
CHARCOEN POKPHAND [Name of Plant] plant in BAKERHILL AL, [City/State] and possibly other plants owned by CHARCOEN POKPHAND [Name of Plant] Equity Group, LLC. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 15 day of Feb, 2007. 00

KENNY LEE HENRY
[PRINT NAME]

Kenny Lee Henry
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Shaleatha King states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC at
[Name of Plant]
the facility located in Baker Hill, AL. I worked at this location from
[City/State]
5/2/2005 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Equity Group, LLC plant in Baker Hill, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Equity Group, LLC. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of February, 2007.

Shaleatha King
[PRINT NAME]

Shaleatha King
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

DESMOND MURRY states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Equity Group, LLC ~~Keystone Foods~~ at
[Name of plant]
the facility located in BAKER HILL, AL. I worked at this location from
[City/State]
May 05 to Aug 05.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that Equity Group, LLC ~~Keystone Foods~~ plant in BAKER HILL, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Keystone Foods. If brought as a class
[Name of Plant] Equity Group, LLC
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 22 day of December, 2006. oo

DESMOND MURRY
[PRINT NAME]

Desmond Murry
[SIGN NAME]